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February 29, 2020

BY EMAIL

The Honorable Sarah L. Cave
United States Magistrate Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Abreu Gil et al; 20-MJ-1461

Dear Judge Cave:

I represent Nelson Diaz (Abdul Alamin) in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A on February 14, 2020.

On February 26, 2020, a bail hearing was held before Your Honor. Following the hearing, Your Honor granted bail pursuant to several conditions, including a personal recognizance bond of \$20,000 to be cosigned by one financially responsible person, home detention with GPS monitoring, travel restrictions to the Southern and Eastern Districts of New York, and supervision as directed by Pretrial Services. Mr. Alamin was released on his own signature and met with Pretrial Services to discuss his release conditions the same day. All conditions were to be satisfied by Monday, March 2, 2020.

The purpose of this letter is to respectfully request an extension until Tuesday, March 10, 2020 to satisfy all conditions of Mr. Alamin’s release. The Government does not object. The extension of time is principally necessary to satisfy the home detention with GPS monitoring condition.

Upon his release, Mr. Alamin returned to his residence and contacted his case manager to assist with restoring his electricity as his rent is in arrears. After speaking with the case manager yesterday, Mr. Alamin must go to a Social Security office and a Human Resources Administration office to resolve his outstanding rent. He intends to do so Monday morning. Once his rent arrears issue is resolved early next week, Con Edison will restore his electricity within one to two days. Accordingly, we anticipate that by Friday, March 6, 2020 or Monday, March 9, 2020, Pretrial Services will be able to go to Mr. Alamin’s residence to set up the home detention equipment and GPS monitoring

device. Regarding the securing of a co-signer, an interview has been scheduled with the Government for Monday, March 2, 2020 with a prospective co-signer and Mr. Alamin's sister, Nancy Ortiz. Based on discussions with Ms. Ortiz, I anticipate that she will be approved, and the bond will be co-signed on March 2, 2020.

Since his release, Mr. Alamin and I have worked with Pretrial Services and the Government to satisfy his conditions of release. We are confident that in the coming week, all conditions will be met. Accordingly, we respectfully request an extension until Tuesday, March 10, 2020 to satisfy Mr. Alamin's bail conditions.

Thank you for your consideration.

Respectfully submitted,

/s/

Anthony Cecutti

cc: Assistant United States Attorney Kedar Bhatia
Assistant United States Attorney Brandon Harper
Pretrial Services Officer Erin Cunningham

Defendant's application is granted.
Deadline to satisfy all conditions
is extended to Mar. 10, 2020.

SO ORDERED: 

SARAH L. CAVE
U.S. MAGISTRATE JUDGE